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April 7, 2025

Hon. John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Application to require 100 Co-signers denied without prejudice at this time. The proposed surety should be interviewed by the Government or the defendant should propose one or more additional sureties.

Re: United States v. Stanley
25 CR 29 (JGK)

Dear Judge Koeltl,

We represent Defendant Rosanna Stanley ("Stanley"). Ms. Stanley was released pursuant to an unsecured bond in the amount of \$ 250,000, to be co-signed by a financially responsible person. We bring this application to modify the conditions of Ms. Stanley's bond from an unsecured bond requiring a co-signer to a secured bond with no co-signers.

It is our understanding that the individual who already co-signed the bond for Ms. Stanley in Florida where Ms. Stanley was arrested is out of work and therefore unlikely to be approved by the U.S. Attorney's Office in the Southern District of New York for co-signing the bond in New York. We had explored the possibility of an alternative co-signer. However, our understanding is that at this time, no one else is willing and able to co-sign the bond for Ms. Stanley.

Wherefore, Ms. Stanley respectfully requests that in lieu of a co-signer, she be permitted to secure the bond with her residence. The residence is worth over four times the amount of the bond. According to Zillow, Ms. Stanley's residence is worth between \$ 1.02 million and \$ 1.59 million, with Zillow's estimate placing the property's market value at \$ 1,262,500. There is no mortgage. There is, however, a *lis pendens* that the Government filed against the property post-indictment on February 13, 2025 as the Government considers Ms. Stanley's residence subject to forfeiture.

We asked the U.S. Attorney's Office for their position on modifying the bond to permit Ms. Stanley to secure the bond with her residence in lieu of having the bond co-signed. The Government is opposed to this application on the ground that the home is allegedly subject to forfeiture (and that the Government has already filed a *lis pendens* against the home).

DR 6/Kelty/U.S.D. 4/18/25

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This is the same argument that the Government raised, and the Court rejected, at Ms. Stanley's arraignment when the Government sought to bar Ms. Stanley from encumbering any real property even for the payment of legal fees on the basis that all real property is subject to forfeiture. "THE COURT: The government now says no, we think essentially that the defendant should not be able to take out any equity from the property because it's eventually forfeitable to the government. That would eliminate the defendant's ability to access funds for the payment of legal counsel, and at this point, I'm not prepared to do that." Arraignment Tr. p. 6, L. 20 – 25.

We ask the Court to likewise reject the Government's argument that Ms. Stanley cannot use her residence to secure the bond due to it being subject to forfeiture. We ask only because in the absence of another financially responsible person coming forward to substitute for the out-of-work co-signer from Florida, the alternative to modifying the bond to remove the requirement of a co-signer would appear to be Ms. Stanley being detained pretrial, where no trial date has been set. This is of particular concern as Ms. Stanley's health is not what it was prior to her being struck by a car in December. In our experience, the Metropolitan Detention Center has had difficulty in making sure that inmates with medical conditions receive adequate care as they need it.

* Thank you for your consideration.

Respectfully submitted,

/s/ Joseph R. Corozzo
Joseph R. Corozzo, Esq.
Angela D. Lipsman, Esq.

cc: A.U.S.A.s Diarra Guthrie and Lauren Phillips (via ECF)